

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION,

Case No. 19-md-02913-WHO

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING FURTHER
EXTENSION OF TIME FOR FILING
JOINT SUBMISSION ADDRESSING
ADMINISTRATIVE MOTIONS TO SEAL
FILED IN CONNECTION WITH
MOTIONS FOR SUMMARY JUDGMENT,
MOTIONS IN LIMINE, & MOTIONS RE
SFUSD TRIAL**

This Document Relates to:

ALL ACTIONS

The undersigned parties jointly stipulate and agree, subject to the Court's approval, to a thirty (30) day extension of the deadline for the parties to submit a joint chart addressing all material covered by the administration motions identified by this Court in its September 13, 2024 Order Regarding Administrative Motions To Seal Filed In Connection With Motions For Summary Judgment, Motions In Limine, & Motions Re *SFUSD* Trial (ECF No. 4299). In support thereof, the parties state as follows:

WHEREAS, on September 13, 2024, the Court entered an order identifying 58 administrative motions to seal files in connection with the *San Francisco Unified School District* bellwether case and trial and ordered the parties to submit, within 20 days of entry of the Order¹, a joint chart identifying the documents – by docket number and exhibit – that contains information not publicly disclosed during the *SFUSD* trial that continue to meet the compelling justification standard for sealing and which documents may be unsealed (ECF No. 4299);

WHEREAS, on October 1, 2024, this Court granted the Parties' Joint Stipulation Regarding Extension of Time For Filing Joint Submission Addressing Administrative Motions to Seal Filed

¹ Twenty days from entry of the Court's September 13, 2024, sets forth a deadline of October 3, 2024.

1 in Connection With Motions For Summary Judgment, Motions In Limine, & Motions Re *Sfusd*
2 Trial, extending the deadline to submit a joint chart to November 4, 2024 (ECF No. 4324);

3 WHEREAS, the Parties continue to diligently work to review each motion and related
4 documents filed under seal², review the *SFUSD* trial transcript for the documents' disclosure as
5 well as additional sources and actions wherein documents may have been disclosed, and identify
6 whether the documents continue to require sealing for compelling justification;

7 WHEREAS, the Parties believe additional time is required to ensure each document is
8 properly reviewed and analyzed for confidentiality considerations and they believe that extending
9 the deadline to December 4, 2024, would provide time for more thorough analysis for the Court's
10 subsequent consideration;

11 WHEREAS, the above referenced modifications would not otherwise impact this Court's
12 administration of the Multi-District Litigation, which remains active;

13 NOW THEREFORE, the parties, through their undersigned counsel, hereby jointly
14 stipulate, agree and respectfully request that the Court enter an Order further extending the deadline
15 for parties' joint chart submission regarding administration motions filed in connection with
16 motions for summary judgment, motions in limine, & motions regarding the *SFUSD* trial to
17 December 4, 2024.

18 RESPECTFULLY SUBMITTED this 28th day of October 2024.
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28 ² The Court's September 13, 2024 Order affects 58 motions filed by six parties, and in sum
implicates over 300 original exhibits, 76 depositions, and 26 expert reports.

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PROPOSED ORDER

**PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY
ORDERED:**

The deadline for joint chart submission regarding administration motions filed in connection with motions for summary judgment, motions in limine, & motions regarding the *SFUSD* trial that is currently due on November 4, 2024 shall be extended to December 4, 2024.

Date: _____, 2024

HONORABLE WILLIAM H. ORRICK
United States District Judge